

COUNTY OF PLACER  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
ENVIRONMENTAL HEALTH DIVISION

Richard J. Burton, M.D., M.P.H.  
Director and Health Officer



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Environmental Health Director

December 6, 2007

JoAnn Jaschke  
Evaluation Team Leader  
California Environmental Protection Agency – Unified Program Section  
1001 I Street, PO Box 2815  
Sacramento, CA 95812-2815

Re: Certified Unified Program Agency Evaluation  
Fifth Corrective Action Status Report (July 1 – September 30, 2007)

Dear Ms Jaschke,

This fifth Corrective Action Status Report is provided to Cal/EPA to update your office regarding the deficiencies identified during Placer County's CUPA evaluation in August 2006.

The Placer County Environmental Health Services CUPA has corrected 13 of the identified deficiencies (1 through 11, 14, and 15). We are including an updates for deficiencies 12 and 13, and observation 12.

Deficiency 12 – (Hazardous Material Inventory/Certification)

Placer County CUPA is aggressively working with business operators to ensure the accuracy of the Hazardous Material Business Plan inventory. Current inventories are being verified during every annual inspection. During the inspection process, Environmental Health staff meets with the owner/operator to complete a new inventory submission or inventory certification. The annual submission or certification is completed and collected at the time of the annual inspection. Approximately 55% of all facilities were current on September 30, 2007. Inventory and certifications are also tracked electronically to help ensure compliance. We anticipate having all facilities current with their inventory or certification by April 1, 2008.

Deficiency 13 – (CalARP Program)

During this quarter, Placer County's CalARP inspector completed field training with Sacramento County. Staff has evaluated stationary sources subject to the CalARP program and we continue to research inspection requirements and receive training to complete the field inspection process. Nine facilities are subject to CalARP inspection. Four of these facilities will be inspected in December 2007. The remaining five facilities will be inspected during the first and second quarter of 2008.

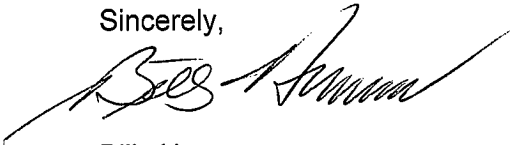
Observation 12 – (South Placer Fire Protection District permit fees)

Placer County Environmental Health has spoken with South Placer Fire Protection District on numerous occasions regarding this issue. Deputy Chief Lawrence Bettencourt states that the District derives its authority to charge fees from Health & Safety Code Section 13916. The District is not using sections 8001.3.2 or 8001.3.3 of the Uniform Fire Code as authority for their permitting and fee schedule. According to the District, hazardous material fees are not charged to facilities within their service area. A copy of the South Placer Fire Protection District Fee Schedule was previously submitted to Cal/EPA.

If you have any questions regarding this quarterly status report, please contact me at (530) 745-2330.

The Sixth Corrective Action Quarterly Status Report will be submitted by January 15, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Billy Harmon", with a stylized flourish extending from the end.

Billy Harmon  
Supervising Environmental Health Specialist  
Placer County Environmental Health Services

Cc: Jill Pahl, Director, Placer County Environmental Health

## **Cal/EPA's Response to Placer County's Deficiency Status Report (Update 5)**

### **CUPA: Placer County Environmental Health Services**

**Date of Evaluation: July 19 and 20, 2006**

**Date of Update 5: December 6, 2007**

### **Cal/EPA and OES response**

Deficiency 12: Cal/EPA and OES appreciate the progress the CUPA is making towards correcting this deficiency. Please continue to update Cal/EPA and OES on the progress, including an estimated percentage of new inventories or current certifications, via deficiency progress reports. The next report is due March 5, 2008.

Deficiency 13: Please report progress on next quarterly report. The CUPA's stated inspection plan is quite ambitious, and the second anniversary of the evaluation is not that far off. If the CUPA inspects 6 of the 9 stationary sources by the end of the second quarter 2008, OES will consider the deficiency corrected. The next report is due March 5, 2008.

In addition to the identified deficiencies, Placer County is following up with Observation 12 from the evaluation.

### **Observation #12**

**Cal/EPA Response:** The CUPA's follow up sufficiently addresses this observation. The South Placer Fire District is not using sections 8001.3.2 and 8001.3.3 of the Uniform Fire Code as authority for their permitting and fee schedule.